



Summary of Expected Testimony on the Evaluation
of Groundwater Treatment and Water Supply Alternatives
for St. Louis Park, Minnesota

Prepared by the State of Minnesota and
the United States of America
to be submitted to Reilly Tar & Chemical Corporation
in accordance with paragraph 6 of the Case Management Order
of the Honorable Paul A. Magnuson

I. Background

In August, 1982, the State of Minnesota (State) and the United States of America (United States) retained CH₂M Hill as an expert witness to evaluate groundwater treatment and water supply alternatives for St. Louis Park. Information obtained prior to this date demonstrated that wells in St. Louis Park were contaminated with PAH and resulted in the closure of several municipal drinking water wells. This closure resulted in a reduction in the capacity of St. Louis Park to provide potable water.

The CH₂M Hill study was designed to evaluate the feasibility of alternative methods of treating the contaminated water or of otherwise returning St. Louis Park to the capacity which existed before the well closure. The study also provides a recommendation as to which treatment method should be implemented. The background, scope, implementation and results of the study are described in a two-volume report prepared by CH₂M Hill, dated November, 1983. The title of the report is "Evaluation of Groundwater Treatment and Water Supply Alternatives for St. Louis Park, Minnesota" (CH₂M Hill Report).

II. Availability of CH₂M Hill Report.

In compliance with paragraph 6 of the Court's Case Management Order in the Reilly litigation, the State and the United States refer Reilly to the CH₂M Hill Report which they have already produced to Reilly.

III. Names of Experts and Areas of Testimony

The names of the experts who may testify about the evaluation of the groundwater treatment and water supply alternatives for St. Louis Park are:

A. Michael R. Harris, Project Manager, CH₂M Hill.

Mr. Harris will be prepared to testify about the following:

1. Background to and purposes of the CH₂M Hill study and Report, including an explanation of the purposes of or introduction to each section of the

study as identified in the Table of Contents at pages 1-2 of the CH₂M Hill Report);

2. Literature search and technology assessment described in the CH₂M Hill Report;
3. Analysis of the information and data obtained from the study, including, among other analyses, (a) an evaluation of alternative treatment methods which could be implemented to provide full capacity water supply to St. Louis Park and (b) the selection of the recommended water supply alternative for St. Louis Park;
4. Responses to proposals or suggestions Reilly may make or information it may generate regarding the design of the recommended water supply alternative for St. Louis Park; and,
5. Presence and quantities of PAH found in the municipal water supplies of Minneapolis, St. Paul, Hopkins and other cities in the United States.

B. Dean Malotky, Barr Engineering.

Mr. Malotky will be prepared to testify about the following:

On-site procedures used in well sampling, conducting the on-site treatment investigation, and performing the day-to-day operations required for the pilot scale testing program, including (but not limited to) chain of custody of samples taken.

C. Harold Cole, GCS Operator, CH₂M Hill.

Mr. Cole will be prepared to testify about the following:

Analysis of samples taken, including test protocol and actual analytical methodology employed in evaluating the well samples and the water quality in water supplies near St. Louis Park and including the analytical work involved in the various bench scale tests and pilot-scale testing programs undertaken in the study.

D. Steve Gelman CH₂M Hill.

Mr. Gelman will be prepared to testify about the following:

Day-to-day work involved in the bench scale testing program described in section 6 of the CH₂M Hill Report.

E. Roberta Perry, CH₂M Hill.

Ms. Perry will be prepared to testify about the following:

On-site procedures involved in the day-to-day operations required for the pilot scale testing program.

F. Alan Gebhardt, Barr Engineering.

Mr. Gebhardt will be prepared to testify about the following:

Costs associated with Alternatives 2 and 3 as identified at page 3 of the Table of Contents of the CH₂M Hill Report.

UNCLASSIFIED

IN DATE

DUNS: 00-641-8685
REILLY TAR & CHEMICAL
CORPORATION

DATE PRINTED
MAY 05 1985

SUMMARY
RATING 5A1

151 N DELAWARE SUITE 1510
AND BRANCH(ES) OR DIVISION(S)
INDIANAPOLIS IN 46204
TEL: 317 638-7531

MFG CHEMICALS

SIC NOS.
28 65 28 22 65 13

STARTED 1905
PAYMENTS SEE BELOW
SALES \$150,000,00
WORTH F \$83,058,234
EMPLOYS 600(29 HERE)
HISTORY CLEAR
CONDITION STRONG
TREND UP

CHIEF EXECUTIVE: PETER C REILLY, CHB

PAYMENTS (Amounts may be rounded to nearest figure in prescribed ranges)

REPORTED	PAYING RECORD	HIGH CREDIT	NOW OWES	PAST DUE	SELLING TERMS	LAST SALE WITHIN
04/85	Disc	1000	1000	-0-		1 Mo
	Ppt	15000	2500	-0-	N30	1 Mo
	Ppt	7500	-0-	-0-	1 15 N30	6-12 Mos
	Ppt	2500	-0-	-0-	N30	6-12 Mos
	Ppt	2500	-0-	-0-		6-12 Mos
	Ppt	1000	100	50	N30	1 Mo
	Ppt	750	500	-0-		
	Ppt	750	-0-	-0-	N30	6-12 Mos
	Ppt	500	500	-0-		1 Mo
	Ppt	500	-0-	-0-	N30	6-12 Mos
	Ppt	500	-0-	-0-		6-12 Mos
	Ppt	250	-0-	-0-		4-5 Mos
	Ppt	100	-0-	-0-	N30	
	Ppt	100	-0-	-0-	N30	6-12 Mos
	Ppt	100	-0-	-0-	N30	6-12 Mos
	Ppt-Slow 15	7500	7500	-0-		1 Mo
	Ppt-Slow 30	15000	-0-	-0-		4-5 Mos
	Ppt-Slow 30	500	-0-	-0-		1 Mo
	Ppt-Slow 90	80000	70000	40000		1 Mo
	Slow	7500	750	750		
	(021)	100000	15000	-0-		1 Mo
03/85	Disc	5000	-0-		Regular terms	
	Ppt	100000	100000	-0-		1 Mo
	Ppt	30000	20000	-0-	N30	1 Mo
	Ppt	7500	2500	-0-		1 Mo
	Ppt	2500	750	250		1 Mo
	Ppt	2500	1000	-0-	N30	1 Mo
	Ppt	1000	50	-0-		1 Mo
	Ppt	250	50	-0-	N30	1 Mo
	Ppt	250	-0-	-0-		2-3 Mos
	Ppt	250	-0-	-0-		6-12 Mos
	Ppt	100	50	50		2-3 Mos
	Ppt-Slow 15	5000	2500	1000	N30	1 Mo
	Ppt-Slow 15	5000	-0-	-0-		4-5 Mos
	Slow 5	60000	-0-	-0-	Regular terms	4-5 Mos